

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

OWNERS INSURANCE COMPANY,

Plaintiff,

v.

TAMARA NICOLE DOCK, as Surviving
Parent of Albert Wilson Dock and as
Administrator of the ESTATE OF
ALBERT WILSON DOCK; and
ANTOINE OMAR MCLENDON,

Defendants.

Civil Action No.
4:21-cv-00266-RSB-CLR

**JOINT MOTION OF ALL PARTIES TO STAY PROCEEDINGS
AND INCORPORATED MEMORANDUM OF LAW**

COMES NOW Tamara Nicole Dock, as Surviving Parent of Albert Wilson Dock and as Administrator of the Estate of Albert Wilson Dock, Defendant in the above-styled matter, and Plaintiff Owners Insurance Company hereby file this their Joint Request to Stay Proceedings, showing as follows:

1. This action has been pending since September 22, 2021.
2. The parties are in the process of documenting a settlement and once finalized, this settlement will dispose of all claims raised in the instant declaratory judgment action, including Plaintiff's claims against Defendant McLendon.
3. Currently pending before the Court is the Motion of Defendant Tamara Nicole Dock to Dismiss. (Doc. No. 9). As of the date of this filing, said motion has not been

resolved. Once consummated, the settlement will alleviate the Court from the necessity of ruling on said motion.

4. The parties jointly request that the Court stay this matter for thirty days, to allow time for finalization of the settlement.

5. The Court “has broad discretion to stay proceedings as an incident to its power to control its own docket.” Clinton v. Jones, 520 U.S. 681, 706 (1997) (citation omitted); see also Landis v. N. Am. Co., 299 U.S. 248, 254 (1936) (“[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.”).

6. Once the settlement is finalized, the parties will jointly file a Stipulation of Dismissal with Prejudice.

WHEREFORE, the parties request that the case be stayed pending settlement consummation of the settlement.

THIS THE 20th DAY OF APRIL, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the within and foregoing document on all parties via email and United States Mail, first class, postage prepaid.

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THIS THE 20th DAY OF APRIL, 2022.

SAVAGE & TURNER, P.C.

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